

AR0008

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Verbal

Response to EPA comments of April 15, 1991 draft of Navajo Consultation. Each comment has been numbered on the copy faxed to ATSDR and these response numbers refer to the numbered comments of EPA.

- 1.
2. the comment refers to the example given of an individual at 10 feet or 20 feet from a pile. The consultation does not state that a risk assessment is needed. The text is an example explaining that as an individual approaches a radioactive pile, that person's exposure increases accordingly.
3. This paragraph has been omitted and replaced with language from the NCRP and recommendations that the NCRP has published. The request for the time needed to remove the material is related to risk assessment and risk management which are not the purview of ATSDR to address.
4. The data used to suggest the imminent radiological health threat is the data of radiation levels supplied to ATSDR by the EPA. Radiological data is different than data normally seen by Superfund. The risks associated with radiation are better known than the risks associated with chemicals. The risks with radiation vary as a function of time in an area, distance from the material (inverse square law), and the degree and type of shielding between the radioactive material and a population.
5. The text of 10 CFR 20.104-105 is the Federal Regulation and this can be found by any individual who so requests the text. No quote is necessary.
6. The regulations of 40 CFR 190.10 is not a risk assessment but another Federal regulation dealing with radiation exposures.
7. With respect to gamma radiation, health physicists world-wide generally consider a exposure of one roentgen to be equivalent to one rem because the quality factor (QF) of gamma radiation is equal to one. This is explained using the relationship of dose = exposure x QF. For alpha radiation, the QF = 20, for beta QF = 1. Neutron radiation varies by energy of the neutrons.
8. The Rn-222 data is been collected by the Navajo Superfund Office (NSO). The NSO should relay those data to EPA and EPA to ATSDR.
9. This comment refers to the letter received by ATSDR.
10. The local residents can stay in the area with stipulations. It is not highly likely that these people will agree to be relocated during clean-up.
- 11.
12. Previous text stated that the Rn-222 data are needed to complete the impact on public health (top of page 6).

13. The recommendation does not state what remedy is to be used but that "an appropriate and approved method" should be used. The procedure is left to the EPA to decide.
14. Because it is foreseeable that the residents will not be relocated, the safety plan needs to address the safety of the residents. In the final draft of the consultation, the last recommendation is that the recommendations of the Public Health Advisory are still appropriate, i.e. education programs conducted by ATSDR.
15. The consultation states that both an immediate health concern and a chronic concern are present at the sites based on the location of an individual.

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